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Docket No.: LE9-00-081  
Amendment

- A2
25. (Original) The computer program product of claim 20, wherein the peripheral device is a printer.
26. (Original) The computer program product of claim 20, wherein the peripheral device is a copy machine, scanner, or fax machine.
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### Remarks

Reconsideration of the Application is requested in view of the amendments and the following argument.

The Abstract has been amended to meet the required word limit. Claims 1 and 20 have been amended to correct an obvious typographical error.

Claims 7, 12 and 16 are rejected as anticipated by Gase (Gase et al. U.S. Pat. No. 5,580,177). For the following reasons, Gase does not anticipate these claims.

Gase discloses a system in which a GUI displays status information for a selected printer from a plurality of printers and causes the appropriate printer drive containing the printer operating code to be installed in one of a plurality of client processors. In contrast, claims 7, 12 and 16 define a system in which a GUI issues commands that direct the operation of a printer.

In particular, claim 7 defines the invention as a system for managing data in a Windows environment of a computer having a host processor and including a "printer data module containing an operating code for operating the printer and causing the printer to execute a predetermined action corresponding to a computer command initiated at the GUI." It is argued that column 2, lines 36-38 and column 4, lines 57-59 of Gase disclose the GUI and printer data module elements defined in claim 7. However, as stated in column 4, lines 55-65 of Gase, the GUI in Gase causes printer data modules to be installed in client processors and queries the status of print queues, the printer server and printers in response to user selections. Unlike the claimed invention, Gase does not disclose or suggest a GUI that triggers the printer data module causing the printer to execute actions.

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Similarly, claim 12 defines the invention as a method for managing data in a Windows environment of a computer having a host processor and includes the step of "causing the printer to execute a predetermined action corresponding to a computer command initiated at the GUI from an operating code." While the printer driver described in column 3 lines 18-22 of Gase contains operating code capable of causing the printer to execute a predetermined action, Gase does not disclose or suggest a GUI that issues commands that trigger the operating code of a printer.

Claim 16 defines the invention as a system for managing data including "an operating means for causing the printer to execute a predetermined action corresponding to a computer command initiated at the GUI from an operating code." As discussed above, Gase does not disclose or suggest a system in which the operating code is triggered by the GUI.

Thus, it is submitted that claims 7, 12 and 16 define over Gase on the basis that Gase does not disclose or suggest a GUI that initiates a computer command that triggers the operating code to activate a printer. Accordingly, the rejection of claims 7, 12 and 16 should be withdrawn and the claims allowed.

Claim 1 is rejected as defining obvious subject matter over Gase combined with Hamilton (Hamilton et al. U.S. Pat. No. 5,950,001). For the following reasons, claim 1 is not obvious over the cited references.

Claim 1 defines the invention as an operating system where "the list of conflicts of the conflict dialog module is unaffected by a modification to the GUI code." It is argued that column 5, lines 62-65 and column 6, lines 22-24 of Hamilton disclose a method of modifying a GUI without affecting software components, and that the combination of this teaching with Gase would lead one to create a printer interface permitting independent modification of the GUI and the software components. However, the GUI and software components described in Hamilton are not analogous to the GUI module, printer data module and conflict dialog disclosed in the current invention. Rather, Hamilton is directed to a customizer to be used with an application builder tool in the development of software applications composed of software components. The customizer provides a method of modifying the properties of standard software components that are combined to create

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custom-built software applications. As stated in column 5, lines 40-43 of Hamilton, the customizer has an associated GUI through which a user may make selections to modify the properties of a software component of the software application being developed. The independently modifiable software components described in Hamilton are not components of the customizer; rather, they are components of software applications being developed by the application builder tool with the customizer.

Accordingly, Hamilton does not teach or suggest that modification of the GUI component of the customizer would not affect the operating code component or the list of conflicts of the customizer. A combination of Hamilton and Gase would therefore result in a system having an associated GUI that is used to modify the properties of a software component of another application. Thus, it would not be obvious to one of ordinary skill in the art, in view of the teachings of Gase and Hamilton, to create an interface for a host processor where the GUI module is independently modifiable from the conflict dialog module, such that modification of the GUI does not affect the list of conflicts, as required in claim 1 and therefore claim 1 should be allowed.

Independent claim 20 also defines over Gase and Hamilton. Claim 20 defines the invention as a computer program having "instructions within the computer readable medium for operating a peripheral device and causing the peripheral device to execute a predetermined action corresponding to a computer command initiated at the GUI." As previously noted, Gase does not include a GUI that triggers the data module to cause a peripheral device, such as a printer, to execute a predetermined action, and Hamilton also fails to disclose this element. Therefore, a combination of Gase and Hamilton fails to disclose or suggest a system having this feature. Furthermore, neither Hamilton nor Gase teach a system in which instructions for generating a GUI may be independent from the instructions for generating a conflict list, allowing the GUI instructions to be modified without affecting or influencing the instructions generating a conflict list as required in claim 20.

Thus, it is submitted that it would not be obvious from the teachings of Gase and Hamilton to create the interface for operating a printer where the GUI module is independently modifiable

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from the conflict dialog module, such that modification of the GUI does not affect the list of conflicts, as defined in claim 20, and therefore claim 20 should be allowed.

Claims 2-4 are rejected as defining obvious subject matter over Gase combined with Hamilton. It is argued that because customization of the software components is generated separately in Hamilton, modification of one component does not affect other components. However, claims 2-4 depend from claim 1 and distinguish over Gase and Hamilton for at least the same reasons as claim 1. Furthermore, while software components are separately modified in Hamilton, it is neither stated nor implied that modification of one software component does not affect other software components of the application being developed. Accordingly, claims 2, 3 and 4 distinguish over the combination and should be allowed for this additional reason as well.

Hamilton is directed to a customizer used in application builder tools to modify properties of software components. The purpose of the customizer, as stated in Hamilton (column 2, lines 8-10) is to provide a method and an apparatus for accurately and efficiently customizing a single software component. Modification of one property of the component may require modification of related properties and the possibility of properties being incorrectly modified is high due to the complex nature and large number of properties in larger software components (see column 1, lines 55-68 and column 2, lines 1-5). The custom-built applications developed with the application builder tools are composed of interlinked software components selected by the user, according to column 1, lines 24-27 of Hamilton.

The Hamilton reference does not disclose whether modification of one software component affects other components within an application. For example, changing the size of a software component in a display may not modify a second software component in the application, but may very well affect that second component. While Hamilton may describe separate customization of software components, it is not stated, nor can it be inferred, that modification of one software component does not affect other software components.

Therefore, in contrast to the system defined in claims 2-4, Hamilton and Gase, whether taken alone or in combination, fail to disclose the claimed system in which modification of a

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module in the system does not affect other modules in the system. Thus, it would not be obvious, in view of the teachings of Gase and Hamilton, to create an interface for operating a printer where the GUI module, the data module and the conflict dialog module are independently modifiable, such that modification of the GUI does not affect the data module or the list of conflicts or such that modification of the data module or the list of conflicts does not affect the GUI module. Accordingly, claims 2, 3 and 4 distinguish over the combination and should be allowed for this additional reason as well.

Claims 8-11, 13-15 and 17-19 are rejected as defining obvious subject matter over Gase combined with Hamilton. Each of these claims defines over Gase because Gase does not disclose a GUI that triggers the operating code of the printer. Hamilton also fails to disclose this element. Therefore, a combination of Gase and Hamilton would fail to disclose or suggest a system having this feature. Accordingly, claims 8-11, 13-15 and 17-19 should be allowed.

Dependent claim 9 defines the invention as a system in which modification of the GUI code does not affect the operating code of the printer data module and dependent claims 11, 14 and 18 require that modification of the GUI code not affect the list of conflicts. As discussed above, Hamilton does not teach or suggest the modification of GUI code may be modified without affecting the operating code or the list of conflicts. Therefore, Hamilton cannot be used to add this element to Gase.

Dependent claims 8, 13 and 17 define the invention as a system in which modification of the conflict list does not affect the GUI code and dependent claims 10, 15 and 19 define a system in which modification of the operating code does not affect the GUI code. It is argued that because customization of the software components is generated separately in Hamilton, modification of one component does not affect other components. As discussed above, Hamilton does not disclose or suggest a system where modification of one software component does not affect other software components.

Therefore, in contrast to the system defined in claims 8-11, 13-15 and 17-19, Hamilton and Gase, whether taken alone or in combination, fail to disclose the claimed system in which

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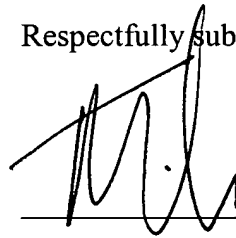
modification of a module in the system does not affect other modules in the system. Thus, it is not obvious, in view of the teachings of Gase and Hamilton, to create an interface for operating a printer where the GUI module, the data module and the conflict dialog module are independently modifiable, such that modification of the GUI does not affect the data module or the list of conflicts or such that modification of the data module or the list of conflicts does not affect the GUI module.

Claims 5 and 6 depend from claim 1 and distinguish over Gase and Hamilton for at least the same reasons as claim 1.

Claims 21-26 depend from claim 20 and therefore distinguish over the purported combination of Gase and Hamilton for at least the same reasons as claim 20.

In view of the foregoing arguments and amendments, it is submitted that the application is in a condition for allowance and a formal notice thereof is respectfully requested. The commissioner is hereby authorized to charge any additional fees required, including the fee for an extension of time, or to credit any overpayment to Deposit Account 20-0809. The applicant(s) hereby authorizes the Commissioner under 37 C.F.R. §1.136(a)(3) to treat any paper that is filed in this application which requires an extension of time as incorporating a request for such an extension.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Theodore D. Lienesch', written over a horizontal line.

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